## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA **EASTERN DIVISION**

| George D. McCarley                |   |                                    |
|-----------------------------------|---|------------------------------------|
| Plaintiff                         | ĺ | Civil: Action No. 3:06-CV-0091-MEF |
| v.                                |   | Lead Case <sup>1</sup>             |
|                                   |   | *                                  |
| Household Finance Corporation III |   |                                    |
| Defendant                         | ĺ |                                    |

PLAINTIFF RESPONSE TO ORDER OF DOC. #80-1.

Plaintiff was ordered to file an amended Motion to Compel Discovery, by October 10, 2007. Specifically, plaintiff is ordered to "provide a short statement concisely listing the interrogatory number which remains unanswered."

Plaintiff contends none of the responses provided meet the true spirit of discovery intended by "the rules." Plaintiff provides the following concise list of questions that are:

| Seriously Incomplete             | Not Responded At All |
|----------------------------------|----------------------|
| 4. (III)(ii)                     | 26. 45.              |
| 4. (IV)                          | 27.                  |
| 5.                               | 28.                  |
| 6. $(a),(b),(c),(d),(e),(f),(g)$ | 29.                  |
| 7.                               | 30.                  |
| 9.                               | 31.                  |
| 10.                              | 32.                  |
| 11. $(a),(b),(c),(d),(e)$        | 33.                  |
| 13.                              | 34.                  |
| 14.                              | 35.                  |
| 15. (a),(b),(c)                  | 36.                  |
| 16. (a),(b),(c),(d),(e),(f),(g)  | 37.                  |
| 17.                              | 38.                  |
| 18. (a),(b)                      | 39.                  |
| 19.                              | 40.                  |
| 20.                              | 41.                  |
| 22.                              | 42.                  |
| 24.                              | 43.                  |
| 25.                              | 44.                  |
|                                  |                      |

<sup>&</sup>lt;sup>1</sup> 3:06 cv 00091 (lead case) includes Household Finance Corporation, III (00093), HSBC-Gr. Corp. (00102), HSBC Mortgage Services, Inc. (00104), HSBC Finance Corporation (00101), and, Household International, Inc. (00103).

This is the result after one (1) round of Interrogatory. In the Rule 26(f) scheduling meeting of March 23, 2007, Judge Capel ordered 25 questions and four (4) rounds of exchange. In the event McCarley has not counted the questions or rounds correctly, then McCarley would be happy to re-number or to vary the content of the rounds. However, these are very basic interrogatory questions most strongly related to the subject matter of the case.

We thank the court for the "Order to Compel.

Respectfully submitted

George D. McCarley, Pro Se 216B Chestnut Street Roanoke, Al 36274 334-863-6489

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## PROOF OF SERVICE

I, George D. McCarley, do swear or affirm that on October 9, 2007, I have served the enclosed ACTION on each party to the above or that party's counsel, and on every other person required to be served, by depositing envelope containing the above documents in the United States Mail properly addressed, and with first class postage prepaid, for delivery within 3 calendar days.

The Clerk Middle District of Alabama, Eastern Division One Church Street, PO Box 711 Montgomery, Al 36101-0711 334-954-3600

**Defendant Attorney** Mr. George Parker Bradley Arant Rose and White Alabama Center for Commerce 401 Adams Avenue, Suite 780 Montgomery, Al 36104 334-956-7671, 956-7700

I declare under penalty of perjury that the foregoing is true and correct.

G. M. C. Chully

Executed on October 9, 2007

George D. McCarley